

JENNIFER LEE TAYLOR (SBN 161368)  
JTaylor@mofo.com  
JOYCE LIOU (SBN 277720)  
JLiou@mofo.com  
AMANDA D. PHILLIPS (SBN 305614)  
APhillips@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: (415) 268-7000  
Facsimile: (415) 268-7522

*Attorneys for Specially-Appearing Defendant*  
UBIQUITI NETWORKS INTERNATIONAL LIMITED

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SYNOPSISYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,  
CHING-HAN TSAI, and DOES 1-20,  
inclusive

Defendants.

Case No. 5:17-cv-00561-WHO

**DECLARATION OF GRACE  
CHEN IN SUPPORT OF  
DEFENDANT UBIQUITI  
NETWORKS INTERNATIONAL  
LIMITED'S MOTION TO  
DISMISS FOR LACK OF  
PERSONAL JURISDICTION  
PURSUANT TO RULE 12(b)(2)**

Date: April 26, 2017

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

Judge: Honorable William H. Orrick

1 I, GRACE CHEN, declare as follows:

2 1. My name is Grace Chen and I am employed by Ubiquiti Networks International  
3 Limited, Taiwan Branch, as Accounting Manager. I have served in that role since about  
4 December 2010 and am based in the Taipei, Taiwan office of the company. I submit this  
5 declaration in support of Ubiquiti Networks International Limited's motion to dismiss Synopsys,  
6 Inc.'s complaint for lack of personal jurisdiction and have personal knowledge of the following  
7 facts.

8 2. Ubiquiti Networks International Limited is a company incorporated under the laws  
9 of Hong Kong. Its registered office address is 18/F Edingburgh Tower The Landmark 15  
10 Queen's Road Central, Hong Kong.

11 3. Ubiquiti Networks International Limited has a branch in Taiwan with a principal  
12 office at Suite 107, Floor 12, Song Ren Road, Xin Yi District, Taipei.

13 4. Ubiquiti Networks International Limited conducts business outside of the United  
14 States of America. It has not conducted and does not conduct any business within the State of  
15 California of the United States of America or within the Northern District of California.

16  
17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct.

19 Executed this 16th day of March, 2017, in Taipei, Taiwan.

20  
21  
22  
23 By   
24 GRACE CHEN  
25  
26  
27  
28